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DEC 16 2019

EPA-REGION 10

December 5, 2019

Ms. Natalie Creed
Hazardous Waste Bureau Chief
Idaho Department of Environmental Quality
1410 N. Hilton
Boise, ID 83706

RE: US Ecology Idaho (USEI) Site B – IDD073114654
Request to treat waste via addition of oil or water

Dear Ms. Creed:

Prior to the incident on November 17, 2018, USEI received two types of waste stream for treatment/disposal that are currently not amenable to treatment and/or offsite shipment without an intermediate treatment step. This intermediate treatment consists of addition of oil or water to the waste stream prior to further handling. These wastes are comprised of fine/dusty wastes that were received for treatment in the Stabilization Portion of the Containment Building and metal fines that were received for deactivation. These wastes cannot be treated at USEI at this time due to loss of the Containment Building during the incident and a company-wide moratorium on treatment/disposal of reactive metal fines, respectively. The purpose of this letter is to request IDEQ's concurrence with USEI's method of performing these interim treatment steps.

USEI's intention is to add liquid – either water or mineral oil – to the fine/dusty wastes to render them non-dusty and therefore acceptable for stabilization at the Outdoor Stabilization Facility. Metal fines will be shipped to an offsite treatment facility. The offsite treatment facility requires that the materials arrive packaged in metal drums and saturated with or packaged under mineral oil. Some containers of metal fines will not require further handling as they are already in metal drums and saturated with oil. However, there are a number of drums that will require either saturation with oil, repackaging into metal, or both. Work plans for handling of both types of waste are included with this letter.

If you have any questions or comments, please contact me or Noel Bailey at (208) 834-2275.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Regards,

Jason Evens
General Manager

cc: Margaret Olson, EPA
Brian English, IDEQ
Garrett Bright, IDEQ

USEPA RCRA



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Process for rendering onsite fine waste amenable for treatment at Outdoor Stabilization

1. Process will use water and/or mineral oil to increase the moisture content to greater than 10% and remove any possibility of fugitive emissions during stabilization.
2. Containers will be opened and inspected for viable headspace for addition of enough liquid to saturate waste completely.
3. If there is enough headspace available to saturate all waste, liquid will be added in containment and container will be allowed to sit.
4. If there is not enough headspace, liquid will be added and the saturated non-fine waste will be transferred to another container to make enough headspace available.
5. Once enough headspace is made available to saturate waste completely, liquid will be added to the remaining waste and will be allowed to sit.
6. Containers will be rotated with drum handling equipment and opened to verify that all waste has been contacted and saturated by the liquid.
7. If observed to be needed, another volume of liquid will be added and the containers will be rotated and inspected again for complete saturation.
8. USEI personnel will monitor for any emissions.
9. USEI will perform final waste processing at Outdoor Stabilization.

Process for rendering onsite metal fines waste amenable for offsite shipment

1. Process will use mineral oil to increase the moisture content to greater than 10% to remove any possibility of fugitive emissions and make waste amenable for offsite treatment. Any waste in poly drums will be transferred into metal drums once saturated. This process will be done under cover.
2. Containers will be opened and inspected for viable headspace for addition of enough mineral oil to saturate waste completely.
3. If there is enough headspace available to saturate all waste, mineral oil will be added in containment and container will be allowed to sit.
4. If there is not enough headspace, mineral oil will be added and the saturated non-fine waste will be transferred to another container to make enough headspace available.
5. Once enough headspace is made available to saturate waste completely, mineral oil will be added to the remaining waste and will be allowed to sit.
6. Containers will be rotated with drum handling equipment and opened to verify that all waste has been contacted and saturated by the mineral oil.
7. If observed to be needed, another volume of mineral oil will be added and the containers will be rotated and inspected again for complete saturation.
8. Once all waste is saturated, waste in poly drums will be transferred into metal drums.
9. USEI personnel will monitor for any emissions.
10. USEI will process the waste for offsite treatment.